

## DECLARATION OF FRANCYS JOHNSON

Pursuant to 28 U.S.C. § 1746, I, Francys Johnson, declare:

1. I am the president of the Georgia State Conference of the National Association for the Advancement of Colored People (hereinafter, GA NAACP). I have personal knowledge of the matters stated herein and would testify to the same if called as a witness in Court, except as to those matters alleged upon information and belief, and as to those matters I am informed and believe them to be true and correct.

2. The Georgia NAACP is a plaintiff in this action and is a non-partisan, interracial, nonprofit membership organization.

3. The mission of the Georgia NAACP is to eliminate racial discrimination through democratic processes and ensure the equal political, educational, social and economic rights of all persons, in particular African-Americans.

4. The GA NAACP is headquartered in Atlanta, Georgia and currently has approximately 10,000 members, including adult members and youth members under the age of twenty-one. The Georgia NAACP maintains a network of branches and other units throughout Georgia, from cities to rural counties.

5. The Georgia NAACP works to protect voting rights through litigation, advocacy, legislation, communication and outreach. A considerable amount of our work and resources are devoted to promoting voter registration, voter education, get out the vote efforts, election protection and census participation.

6. The GA NAACP regularly conducts voter registration drives and campaigns throughout Georgia. As a result of this work, the GA NAACP has helped thousands of eligible citizens, including its members and non-members, to register to vote.

7. During the summer and fall of 2016, the GA NAACP has been carrying out its "Voter Empowerment Campaign." The goal of the campaign is to increase voter registration, provide voter education and encourage civic participation across the state and is aimed particularly at students, seniors, returning citizens, urban and rural communities, including communities in Chatham County.

8. During the course of its voter registration work, the GA NAACP has helped many of its own members, as well as non-members, to register to vote, including many as first time applicants. We often encounter first time voter registration applicants through our work with high school students, who wish to pre-register to vote before age 18, college students, young

adults, naturalized citizens, new Georgia residents and other eligible first time Georgia applicants.

9. The GA NAACP maintains a Branch office in the City of Savannah, Chatham County, Georgia, and the Branch has historically mounted significant voter registration efforts in Chatham County, particularly in presidential election cycles.

10. As a result of Governor Deal's evacuation order in advance of Hurricane Matthew on October 6, 2016, as well as the aftermath of the hurricane, the Savannah Branch office of the GA NAACP was closed between October 7 and October 10, 2016. As a result, the Savannah Branch of the GA NAACP was unable to conduct any voter registration activity between October 7 and October 10, 2016 from this branch office as it normally would have done but for Hurricane Matthew.

11. Prior to the emergence of Hurricane Matthew as a threat to Georgia, the GA NAACP had planned to participate in a voter registration event at the Sam's Club at 1975 East Montgomery Cross Road in Savannah, Georgia between 11 a.m. and 4:00 p.m. on Saturday, October 8, 2016. However, as a result of the evacuation order and hurricane damage, the GA NAACP was forced to cancel this event.

12. The Savannah Branch of the GA NAACP had also planned to participate in voter registration activities following church services in Chatham County on Sunday, October 9, 2016. However, those activities were also cancelled as a result of the aftermath of Hurricane Matthew and the extensive power outages, flooding and other problems that resulted from the torrential wind and rain that impacted Chatham County.

13. Due to safety concerns, the GA NAACP also cancelled any door to door voter registration canvassing in Chatham County between October 7, 2016 and October 11, 2016. In addition, the Chatham County Board of Elections was closed between October 7 and 11, 2016, which would have made it impossible for canvassers to personally deliver voter registration applications to the Board of Elections during this time frame.

14. As a result of the impact of Hurricane Matthew on Chatham County, the GA NAACP was unable to conduct what would have normally been an intensive final push to register new voters in the County ahead of the close of voter registration for the upcoming November 8, 2016 general election.

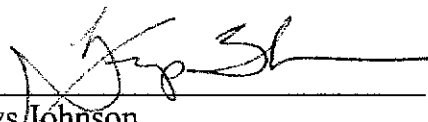
15. Due to the impact Hurricane Matthew had on voter registration in Chatham County, including the fact that the Chatham County Board of Elections was closed between October 7 and October 11, 2016, the GA NAACP respectfully asks this Court to extend the deadline for Chatham

County residents to register to vote for the number of business days when the Chatham County Board of Elections was closed between October 7 and 11, 2016.

I declare that the foregoing is true and correct under penalty of perjury, except to those matters stated upon information and belief, and as to those matters, I am informed and believe them to be true and correct.

Executed this 12<sup>th</sup> day of October 2016 at

Statesboro, Georgia.

  
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Francys Johnson